

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Re: D.I. 13

**CERTIFICATION OF COUNSEL REGARDING INTERIM ORDER (I)
ESTABLISHING PROCEDURES TO SELL CERTAIN LEASES, (II) APPROVING THE
SALE OF CERTAIN LEASES, AND (III) GRANTING RELATED RELIEF**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby certifies as follows:

1. On September 9, 2024 (the “**Petition Date**”),² the Debtors each filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “**Bankruptcy Code**”), and related pleadings with the United States Bankruptcy Court for the District of Delaware. The Debtors are debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. The automatic stay of Section 362(a) of the Bankruptcy Code is in effect.

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

² Capitalized terms not defined herein have the meaning ascribed to them in the Motion.

2. On the Petition Date, the Debtors filed the *Motion of Debtors for Entry of Interim and Final Orders (I) Establishing Procedures To Sell Certain Leases, (II) Approving the Sale of Certain Leases, and (III) Granting Related Relief* (the “**Motion**”) (D.I 13).

3. At the first day hearing (the “**Hearing**”) on September 10, 2024, the Office of the United States Trustee (the “**U.S. Trustee**”) and certain other interested parties raised issues with the interim relief requested in the Motion, and the Court granted the relief requested on an interim basis, with certain modifications.

4. Accordingly, the Debtors have revised the form of order granting the interim relief requested in the Motion (the “**Revised Proposed Order**”), attached hereto as **Exhibit A**, to accurately reflect the Court’s ruling on the record at the Hearing. The Revised Proposed Order has been shared with the U.S. Trustee and counsel for certain landlord who appeared at the Hearing and those parties have no objection to entry of the Revised Proposed Order.

5. A redline comparing the Revised Proposed Order against the Proposed Order is attached hereto as **Exhibit B**.

WHEREFORE, the Debtors request entry of the Revised Proposed Order attached hereto as **Exhibit A**.

[Signature page follows]

Dated: September 11, 2024
Wilmington, DE

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